

that includes at least one business reply mail piece and at least one non-business reply mail piece,” as recited in claim 21.

The Office Action asserts that Connelly discloses a system that receives a mail stream including both business reply mail pieces and non-business reply mail pieces at column 3, lines 21-27 and column 3, lines 34-40 (*see* Office Action, ¶¶3-5). Applicant respectfully disagrees with these assertions.

To further the prosecution of this application, Applicant submits herewith a declaration under 37 C.F.R. §1.132 from Alfred T. Rundle (hereinafter “Rundle Declaration”), a software engineer employed by Lockheed Martin Corporation, the assignee of the present application, with over twenty-eight years of experience in the optical character recognition (OCR) field and with significant experience in the design and creation of address recognition systems for mail processing equipment (Rundle Declaration, ¶1). Mr. Rundle’s declaration is helpful in understanding how one skilled in the art would have understood the teaching of the prior art of record, and is believed to resolve several issues that have been the subject of dispute between Applicant and the Examiner during prosecution of this application. It is respectfully asserted that the rejections cannot properly be maintained in view of Mr. Rundle’s declaration.

Mr. Rundle believes that the system described in Connelly processes only business reply mail pieces, and does not process non-business reply mail pieces (Rundle Declaration, ¶2). Mr. Rundle states that because all processing of mail pieces in Connelly depends on identification of Job ID code printed on the mail piece, it his view that the system would be unable to process non-business reply mail pieces, as such mail pieces would not have a Job ID code printed on them (Rundle Declaration, ¶2). Mr. Rundle also notes that Connelly does not discuss how non-business reply mail pieces could be distinguished from business reply mail pieces or how non-business reply mail pieces could be processed or handled (Rundle Declaration, ¶2).

At ¶3, the Office Action asserts that Connelly discloses that the input feeder module receives mail pieces that are both business reply mail pieces and non-business reply mail pieces at column 3, lines 21-27, which states that, “[b]undles of mail pieces (not shown), such as: business reply cards, post cards, and the like, are loaded by an operator into the processing system 100 at the input feeder module 102.” Applicant disagrees with this assertion for the

reasons discussed in the response mailed January 17, 2006. Significantly, Mr. Rundle also disagrees.

Mr. Rundle states his belief that the above-quoted passage at column 3, lines 21-24 indicates that the system of Connelly is capable of handling different types of business reply mail pieces, such as business reply cards and business reply envelopes, but does not disclose or suggest that the system of Connelly received non-business reply mail pieces (Rundle Declaration, ¶4). Mr. Rundle noted that, at column 3, lines 6-9, Connelly indicates that both business reply mail cards and business reply mail envelopes may be processed. In view of this statement, it is his opinion that the passage at column 3, lines 21-24 indicates that different types of business reply mail pieces may be fed in the feeder unit of Connelly (Rundle Declaration, ¶4).

At ¶¶4-5, the Office Action states that the reference to different mail campaigns in Connelly at column 3, lines 34-40 indicates that the system of Connelly processes both business reply mail pieces and non-business reply mail pieces. Applicant respectfully disagrees, as does Mr. Rundle.

Specifically, it is Mr. Rundle's belief that the reference to different mail campaigns at column 3, lines 34-40 does not indicate that both business reply mail pieces and non-business reply mail pieces may be processed by the system of Connelly, but rather that business reply mail pieces of different sizes and formats may be handled (Rundle Declaration, ¶5). Mr. Rundle states his belief that the term "different mail campaigns" refers to different business reply mail campaigns, each of which may involve a business reply mail piece of a particular size and format (Rundle Declaration, ¶5). Mr. Rundle points out that in numerous passages Connelly describes a mail campaign job database which stores information for processing data for processing a business reply mail piece and which is accessed using a job ID code obtained from a business reply mail piece (Rundle Declaration, ¶5). It is Mr. Rundle's belief that these passages indicate that a mail campaign is a set of business reply mail pieces that each have the same job ID code (Rundle Declaration, ¶5).

In view of the foregoing it should be evident that Connelly fails to disclose, "receiving a stream of mail pieces that includes at least one business reply mail piece and at least one non-business reply mail piece," as recited in independent claims 1 and 11, and that Connelly also fails to disclose a sorting apparatus that includes, "at least one feeder unit that receives a stream of

mail pieces that includes at least one business reply mail piece and at least one non-business reply mail piece,” as recited in independent claim 21. Therefore, independent claims 1, 11, and 21 patentably distinguish over Connelly. Accordingly, it is respectfully requested that the rejection of claims 1, 11, and 21 under 35 U.S.C. §102(e) be withdrawn.

Claims 2-10 depend from claim 1, claims 12-20 depend from claim 11, and claims 22-31 depend from claim 21. Each of these claims is patentable for at least the same reasons as its respective independent claim. Accordingly, it is respectfully requested that the rejection of these claims under 35 U.S.C. §102(e) be withdrawn.



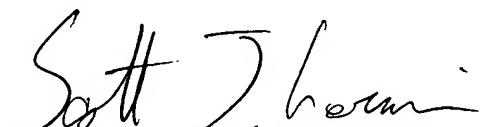
CONCLUSION

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,
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